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10 **Pro hac vice* applications forthcoming

11 *Counsel for Oasis Focus Fund LP and Quadre*
12 *Investments, L.P.*

13

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

16

17 In re Application of
18 Oasis Focus Fund LP and Quadre Investments,
19 L.P.,
20 Petitioners, For an Order Pursuant to 28 U.S.C. §
21 1782 to Conduct Discovery For Use In a Foreign
Proceeding.

22 Case No. 23-
23

24

25 **DECLARATION OF TYLER BURTIS IN**
26 **SUPPORT OF PETITIONERS'**
27 **APPLICATION FOR AN ORDER**
28 **PURSUANT TO 28 U.S.C. § 1782**

1 I, Tyler Burtis, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the
2 following is true and correct:

3 1. I am a private investigator licensed by the State of California. I am the Director of
4 Investigations at Burtis Investigations LLC. I have been retained by Pallas Partners (US) LLP, which
5 I understand is Counsel to Oasis Focus Fund LP and Quadre Investments, L.P., Petitioners in the
6 above-captioned matter, who are making an application for an order of judicial assistance pursuant
7 to 28 U.S.C. § 1782 for discovery from David Katsujin Chao and certain entities affiliated with DCM.

8 2. As part of my search for information on Mr. Chao, I searched proprietary databases
9 that are available to licensed private investigators and law enforcement. These databases collect
10 from publicly available reports and data sources, in addition to data from credit-reporting agencies,
11 employment records, social networks, banks, internet domain registrations, divorce and marriage
12 records, and public tax records.

13 3. I utilized separate proprietary databases and open-source information to run searches
14 on Mr. Chao, certain of his apparent relatives, and property addresses associated with Mr. Chao. The
15 results of those searches stated the following:

- 16 a. Mr. Chao is listed as a current owner and resident of 72 Ralston Road, Atherton,
17 California 94027-3913.
- 18 b. An individual that appears to be Mr. Chao's wife is also resident at 72 Ralston
19 Road, Atherton, California 94027-3913.
- 20 c. Mr. Chao is associated with Zoro X, LLC, an active California-incorporated LLC,
21 as a manager/member.
- 22 d. According to a California Secretary of State registry search, the mailing address
23 for Zoro X, LLC, is 72 Ralston Road, Atherton, California 94027-3913. A true
24 and correct copy of Zoro X, LLC's California Secretary of State registry entry is
25 attached to this declaration as Exhibit 1.

- e. A trust that appears to be associated with Mr. Chao and his wife is associated with Addal Autos, LLC, an active California-incorporated LLC, as a manager/member.
- f. According to a California Secretary of State registry search, the principal and mailing addresses for Addal Autos, LLC, are both 72 Ralston Road, Atherton, California 94027-3913. A true and correct copy of Addal Auto's, LLC's California Secretary of State registry entry is attached to this declaration as Exhibit 2.
- g. Mr. Chao is also listed as a current owner of 4323 25th Street, San Francisco, California.
- h. An individual who appears to be Mr. Chao's son is also resident in San Francisco, California.
- i. Mr. Chao has a phone number with a greater San Francisco Bay area code that is associated with to 72 Ralston Road, Atherton, California 94027-3913, and 4323 25th Street, San Francisco, California.
- j. A cell phone with a Santa Clara/San Mateo area code is registered to DCM and appears to be affiliated with Mr. Chao.

Dated: December 12, 2022

By:

Tyler Burtis

EXHIBIT 1

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Search

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Business Search

The California Business Search provides access to available information for **corporations**, **limited liability companies** and **limited partnerships** of record with the California Secretary of State, with **free PDF copies** of over 17 million imaged business entity documents, including the most recent imaged *Statements of Information* filed for Corporations and Limited Liability Companies.

Currently, information for Limited Liability Partnerships (e.g. law firms, architecture firms, engineering firms, public accountancy firms, and land survey firms), General Partnerships, and other entity types are **not contained** in the California Business Search. If you wish to obtain information about LLPs and GPs, submit a *Business Entities Order* paper form to request copies of filings for these entity types. Note: This search is not intended to serve as a name reservation search. To reserve an entity name, select *Forms* on the left panel and select *Entity Name Reservation ? Corporation, LLC, LP.*

Basic Search

A Basic search can be performed using an entity name or entity number. When conducting a search by an entity number, where applicable, **remove "C"** from the entity number. Note, a **basic search** will search **only ACTIVE entities** (Corporations, Limited Liability Companies, Limited Partnerships, Cooperatives, Name Reservations, Foreign Name Reservations, Unincorporated Common Interest Developments, and Out of State Associations). The basic search performs a contains ?keyword? search. The Advanced search

ZORO X, LLC (202016310197)



Request Certificate

Initial Filing Date	06/10/2020
Status	Active
Standing - SOS	Good
Standing - FTB	Good
Standing - Agent	Good
Standing - VCFCF	Good
Formed In	CALIFORNIA
Entity Type	Limited Liability Company - CA
Principal Address	1150 FOLSOM STREET, UNIT 1 SAN FRANCISCO, CA 94103
Mailing Address	72 RALSTON ROAD ATHERTON, CA 94027
Statement of Info Due Date	06/30/2022
Agent	1505 Corporation 112 C T CORPORATION SYSTEM 28 LIBERTY STREET NEW YORK, NY 10005
CA Registered Corporate (1505) Agent Authorized Employee(s)	AMANDA GARCIA 330 N BRAND BLVD, GLENDALE, CA GABRIELA SANCHEZ 330 N BRAND BLVD, GLENDALE, CA DAISY MONTENEGRO 330 N BRAND BLVD, GLENDALE, CA BEATRICE CASAREZ-BARRIENTEZ 330 N BRAND BLVD, GLENDALE, CA JESSIE GASTELUM 330 N BRAND BLVD, GLENDALE, CA JOHN MONTIJO 330 N BRAND BLVD, GLENDALE, CA

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An Advanced search is required when searching for publicly traded disclosure information or a status other than active.

An Advanced search allows for searching by specific entity types (e.g., Nonprofit Mutual Benefit Corporation) or by entity groups (e.g., All Corporations) as well as searching by ?begins with? specific search criteria.

Disclaimer: Search results are limited to the 500 entities closest matching the entered search criteria. If your desired search result is not found within the 500 entities provided, please refine the search criteria using the Advanced search function for additional results/entities. The California Business Search is updated as documents are approved. The data provided is not a complete or certified record.

Although every attempt has been made to ensure that the information contained in the database is accurate, the Secretary of State's office is not responsible for any loss, consequence, or damage resulting directly or indirectly from reliance on the accuracy, reliability, or timeliness of the information that is provided. All such information is provided "as is." To order certified copies or certificates of status, (1) locate an entity using the search; (2)select Request Certificate in the right-hand detail drawer; and (3) complete your request online.

ZORO X



Advanced ▾

Results: 1

Entity Information

Initial Filing Date

Status

Entity Type

Formed In

Agent

[Skip to main content](#) State


Request Certificate

Initial Filing Date	06/10/2020
Status	Active
Standing - SOS	Good
Standing - FTB	Good
Standing - Agent	Good
Standing - VCFCF	Good
Formed In	CALIFORNIA
Entity Type	Limited Liability Company - CA
Principal Address	1150 FOLSOM STREET, UNIT 1 SAN FRANCISCO, CA 94103
Mailing Address	72 RALSTON ROAD ATHERTON, CA 94027
Statement of Info Due Date	06/30/2022
Agent	1505 Corporation 112 C T CORPORATION SYSTEM 28 LIBERTY STREET NEW YORK, NY 10005
CA Registered Corporate (1505) Agent Authorized Employee(s)	AMANDA GARCIA 330 N BRAND BLVD, GLENDALE, CA
	GABRIELA SANCHEZ 330 N BRAND BLVD, GLENDALE, CA
	DAISY MONTENEGRO 330 N BRAND BLVD, GLENDALE, CA
	BEATRICE CASAREZ-BARRIENTEZ 330 N BRAND BLVD, GLENDALE, CA
	JESSIE GASTELUM 330 N BRAND BLVD, GLENDALE, CA
	JOHN MONTIJO 330 N BRAND BLVD, GLENDALE, CA

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ZORO X, LLC
(202016310197)

06/10/2020

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ZORO X, LLC (202016310197)

Request
Certificate

Initial Filing Date

06/10/2020

Status

Active

Good

Good

Good

Good

Good

CALIFORNIA

Limited Liability Company - CA

Principal Address

1150 FOLSOM STREET,
UNIT 1
SAN FRANCISCO, CA 94103

Mailing Address

72 RALSTON ROAD
ATHERTON, CA 94027Statement of
Info Due Date

06/30/2022

Agent

1505 Corporation
112
C T CORPORATION SYSTEM
28 LIBERTY STREET
NEW YORK, NY 10005

AMANDA GARCIA
330 N BRAND BLVD,
GLENDALE, CAGABRIELA SANCHEZ
330 N BRAND BLVD,
GLENDALE, CADAISY MONTENEGRO
330 N BRAND BLVD,
GLENDALE, CABEATRICE CASAREZ-
BARRIENTEZ
330 N BRAND BLVD,
GLENDALE, CAJESSIE GASTELUM
330 N BRAND BLVD,
GLENDALE, CAJOHN MONTIJO
330 N BRAND BLVD,
GLENDALE, CA

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ADDAL AUTOS, LLC
(201519810003)



Request
Certificate

Initial Filing Date	07/15/2015
Status	Active
Standing - SOS	Good
Standing - FTB	Good
Standing - Agent	Good
Standing - VCFCF	Good
Formed In	CALIFORNIA
Entity Type	Limited Liability Company - CA
Principal Address	72 RALSTON RD. ATHERTON, CA 94027
Mailing Address	72 RALSTON RD. ATHERTON, CA 94027
Statement of Info Due Date	07/31/2023
Agent	1505 Corporation 1739 NORTHWEST REGISTERED AGENT, INC. 2108 N ST STE N SACRAMENTO, CA 95816- 5712



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Basic Search

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Advanced Search

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ADDAL AUTOS, LLC
(201519810003)



[Request Certificate](#)

Initial Filing Date	07/15/2015
Status	Active
Standing - SOS	Good
Standing - FTB	Good
Standing - Agent	Good
Standing - VCFCF	Good
Formed In	CALIFORNIA
Entity Type	Limited Liability Company - CA
Principal Address	72 RALSTON RD. ATHERTON, CA 94027
Mailing Address	72 RALSTON RD. ATHERTON, CA 94027
Statement of Info Due Date	07/31/2023
Agent	1505 Corporation 1739 NORTHWEST REGISTERED AGENT, INC. 2108 N ST STE N SACRAMENTO, CA 95816- 5712



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Results: 1

ADDAL AUTOS, LLC
(201519810003)Entity
InformationInitial
Filing
DateADDAL AUTOS,
LLC
(201519810003)

07/15/2015

Request
Certificate

Initial Filing Date	07/15/2015
Status	Active
Standing - SOS	Good
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